| UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA |   |
|---|---|
|   | X   |
| IN RE:  | : CASE NO.: 16-17821-pmm<br>: CHAPTER: 13 |
| Madeline A. Ceraul aka Madeline Ann Ceraul,                     | : NOTICE OF APPEARANCE                    |
| Debtor.   | : HON. JUDGE.: Patricia M. Mayer          |
|   | :<br>:                                    |
|   | :<br>:<br>X                               |

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf Rushmore Loan Management Services, LLC as servicer for U.S. Bank Trust National Association, not in its individual capacity but solely as trustee for Dwelling Series III Trust, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO, LLP Attorneys for Rushmore Loan Management Services, LLC 1325 Franklin Avenue, Suite 160 Garden City, NY 11530 bankruptcy@FriedmanVartolo.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: October 7, 2021 Garden City, New York

By: /s/ Lorraine Gazzara Doyle
Lorraine Gazzara Doyle, Esq.
FRIEDMAN VARTOLO, LLP
Attorneys for Rushmore Loan Management
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1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100

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|   | ·<br>:<br>:                               |
| V   | :<br>:                                    |
| X   |   |

## **CERTIFICATE OF SERVICE**

On October 7, 2021, I caused to be served a true copy of the annexed **NOTICE OF APPEARANCE by** mailing the same by First Class Mail in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service, addressed to the last known address of the addressee, and the property address as indicated on the attached Service List annexed hereto.

By: /s/Lorraine Gazzara Doyle
FRIEDMAN VARTOLO LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100

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## **SERVICE LIST**

Madeline A. Ceraul 204 South Main Street Pen Argyl, PA 18072 **Debtor** 

WILLIAM HRONIS Law Office of William Hronis 609 Hamilton Street Allentown, PA 18101 **Debtor's Attorney** 

SCOTT F. WATERMAN (Chapter 13) Chapter 13 Trustee 2901 St. Lawrence Ave. Suite 100 Reading, PA 19606 *Trustee* 

United States Trustee Office of the U.S. Trustee 200 Chestnut Street Suite 502 Philadelphia, PA 19106 U.S. Trustee